

Mr. Irving Deutsch
Deutsch Engineering & Testing Services
East Meadow, NY 11554

This responds to your letter of April 13, 1974, asking for an explanation of the term "patrolling" and the patrolling requirement of 49 CFR 192.721(b).

Patrolling is accomplished by traversing a pipeline to observe factors affecting safe operation. Under section 192.721(b), mains "in places or on structure where anticipated physical movement or external loading could cause failure or leakage: must be patrolled at intervals of 3 months, or less. As you point out, these "places" or "structures" could be bridge or roads. Other locations where anticipated physical movement or external loading could cause failure or leakage could be unstable river banks, land slide areas, or areas susceptible to earth subsidence. Each operator must determine which mains are subject to the requirement, taking into account the physical condition of the pipeline and its operating environs.

We appreciate your interest in pipeline safety.

Sincerely,

Joseph C. Caldwell
Director
Office of Pipeline Safety

April 18, 1974

To: 1) Department of Transportation
Office of Pipeline Safety
400 6th Street SW
Washington, D.C. 20590

2) Secretary of the ASME
Gas Piping Standards Committee
c/o ASME
345 East 47th Street
New York, NY 10117

RE: Request for Interpretation of Paragraph 192.721 DOT (852.1 ASME B31.8 Code)

Gentlemen:

I would be extremely grateful if you would provide me with an interpretation or explanation or definition of:

"...places or structures where anticipated physical movement or external loading could cause failure or leakage..."

Generally a gas main on a bridge or under a railroad track might be considered a structure or place, respectively where external loading could cause failure, etc. But the wording is such that one might interpret the meaning to be any road that is subject to truck traffic, for example, or for that matter any road that is subject to traffic. Hence if a gas company inspected or made a leak survey six months before an incident, for example, one might claim that it should have been "patrolled" every three months.

In paragraph 192.3 I do not see the term patrolling defined. I would appreciate a clear cut definition of patrolling.

Your early reply will be appreciated since this enquiry relates to a matter that is in litigation.

Respectfully submitted,

Irving Deutsch, P.E.